

Gordon Rees Scully Mansukhani, LLP
275 Battery Street, Suite 2000
San Francisco, CA 94111

CLAYEO C. ARNOLD (SBN: 65070)
JOHN T. STRALEN (SBN: 171227)
CLAYEO C. ARNOLD
A PROFESSIONAL LAW CORPORATION
865 Howe Avenue
Sacramento, CA 95825
Telephone: (916) 777-7777
Facsimile: (916) 924-1829
jstralen@justice4you.com

IN ASSOCIATION WITH

DARREN GUEZ (SBN: 282023)
THE DARREN GUEZ LAW FIRM
836 57th Street
Sacramento, CA 95819
Telephone: (916) 520-0988
Facsimile: (916) 490-3714
darren@guezlaw.com

Attorneys for Plaintiff
MONICA RANGER

[CAPTION CONTINUED ON NEXT PAGE]

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

MONICA RANGER, individually and on
behalf of all those similarly situated,

Plaintiff,

vs.

SHARED IMAGING, a Limited Liability
Company, and DOES 1 THROUGH 10,
inclusive,

Defendants.

Case No. 2:20-CV-00401-KJM-KJN
*Assigned for All Purposes to the
Honorable Kimberly J. Mueller*

**JOINT STIPULATION TO EXTEND
DEFENDANT'S DEADLINE TO
RESPOND TO COMPLAINT;
ORDER**

Complaint Filed: January 21, 2020

Gordon Rees Scully Mansukhani, LLP
275 Battery Street, Suite 2000
San Francisco, CA 94111

1 LINDA M. MORONEY (SBN: 172668)
KARA D. KEISTER (SBN: 250260)
2 NATALIE B. FUJIKAWA (SBN: 258724)
GORDON REES SCULLY MANSUKHANI, LLP
3 275 Battery Street, Suite 2000
San Francisco, CA 94111
4 Telephone: (415) 986-5900
Facsimile: (415) 986-8054
5 lmoroney@grsm.com
kkeister@grsm.com
6 nfujikawa@grsm.com

7 HENRY A. PLATT (SBN: 142304)
SAUL EWING ARNSTEIN & LEHR LLP
8 1919 Pennsylvania Avenue, N.W., Suite 550
Washington, D.C. 20006
9 Telephone: (202) 342-3447
Facsimile: (202) 29506776
10 henry.platt@saul.com

11 Attorneys for Defendant
12 SHARED IMAGING, LLC
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STIPULATION

Pursuant to Eastern District Local Rule 144, and Fed. R. Civ. P. 6, Plaintiff MONICA RANGER (“Plaintiff”) and Defendant SHARED IMAGING, LLC (the “Defendant”), by and through their respective counsel of record, hereby stipulate as follows:

WHEREAS, On January 21, 2020, Plaintiff filed a putative Class Action Complaint in Sacramento County Superior Court (Case No. 34-2020-00273765-CU-OE-GDS).

WHEREAS, on February 21, 2020, Defendant filed a Notice of Removal in the Eastern District of California (Case No. 2:20-CV-00401-KJM-KJN);

WHEREAS, on February 28, 2020, the Parties filed a joint stipulation to extend Defendant’s deadline to file a responsive pleading until March 27, 2020, and filed a second stipulation to further extend Defendant’s response deadline to April 10, 2020;

WHEREAS, the Parties have continued to engage in good faith meet and confer efforts regarding Defendant’s intent to file a motion to dismiss pursuant to Fed. R. Civ. P. 12, but need additional time to confer regarding the substance of Defendant’s intended motion to dismiss and Plaintiff’s possible amendment of the Complaint;

WHEREAS, Plaintiff has agreed to provide a two-week extension for Defendant to file a responsive pleading, from April 10, 2020, to April 23, 2020, to provide the Parties with sufficient time to complete the meet and confer process;

WHEREAS, good cause exists for Defendant’s extension of time to file a responsive pleading, because it would provide the Parties with the opportunity to resolve their disputes over the Complaint without the necessity of a motion to dismiss.

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1 Based on the foregoing, IT IS HEREBY STIPULATED, by and between the Parties and
2 their respective counsel, that the deadline for Defendant SHARED IMAGING, LLC, to file a
3 responsive pleading to Plaintiff's Complaint is extended to April 23, 2020.

4 **IT IS SO STIPULATED.**

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6 Dated: April 17, 2020

THE DARREN GUEZ LAW FIRM

7
8 By: /s/ Darren Guez
Darren Guez
Attorneys for Plaintiff
9 MONICA RANGER

10
11 Dated: April 17, 2020

GORDON REES
SCULLY MANSUKHANI, LLP

12
13 By: /s/ Natalie B. Fujikawa
Linda M. Moroney
Kara D. Keister
14 Natalie B. Fujikawa
15 Attorneys for Defendant
16 SHARED IMAGING, LLC
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ORDER

Pursuant to the Parties' stipulation, **IT IS SO ORDERED**. Defendant shall answer or otherwise respond to Plaintiff's Complaint on or before Friday, April 23, 2020.

Dated: April 17, 2020.



CHIEF UNITED STATES DISTRICT JUDGE

Gordon Rees Scully Mansukhani, LLP
275 Battery Street, Suite 2000
San Francisco, CA 94111